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OFFICE OF GENERAL  
COUNSEL

Phillip Christopher Hughey  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

**RE: MUR # 6375: RESPONSE from the Independence Caucus to complaint against the Independence Caucus and its Treasurer Frank Anderson, filed by Karen Emily Hyer**

To the General Counsel's Office; Jeff Jordan, Kim Collins, et al.:

In response to the complaint MUR 6375; The Independence Caucus (FEC ID C00461764), a non-connected PAC, has not violated FEC laws, rules, and regulations as alleged; with the sole exception of late filing; and presents the following demonstration in writing that no action should be taken against the Independence Caucus PAC and/or myself, Frank Anderson, as Treasurer.

### **Background Information:**

- 1 - The Independence Caucus received notice of this complaint via US Mail on Friday September 24<sup>th</sup>, 2010
- 2 - The Independence Caucus is a non-profit corporation, incorporated in the state of Utah, engaged in research, education, and citizen activist training activities. These activities include vetting and endorsing candidates for public office; all of which were conducted by volunteers in compliance with the Federal Election Campaign Act of 1971, as amended ("the Act").
- 3 - In addition, the Independence Caucus has created a non-connected 527 PAC, "The Independence Caucus PAC", which as of the last reported filing period ending June 30<sup>th</sup>, 2010 was never used for any purpose, and which never solicited or received donations, and which never expended any money, and which never made any donations directly or indirectly to any other PAC or federal candidates.
- 4 - Activity for the PAC did begin for the first time in September, 2010, and will be accurately reported in the 3<sup>rd</sup> quarter report which is due by October 15<sup>th</sup>, 2010.
- 5 - Beginning on Page 2 of 5, under the heading of FEC VIOLATIONS BY THE INDEPENDENCE CAUCUS, the complainant lists a series of allegations. Those allegations are copied in the enclosed "Appendix A"; wherein we have numbered them sequentially for reference purposes.

**Specific responses to alleged FEC violations:**

**Allegations #1a & 1b, (page 2 of 5, MUR 6375, see attached Appendix A for reference):**

**Response:** As treasurer, I, Frank Anderson, did file the 2<sup>nd</sup> quarter report after the filing deadline of July 15<sup>th</sup>, and I have filed other quarterly reports after their respective filing deadlines.

**Mitigating circumstances:** The responsibility falls completely on myself, Frank Anderson, for missing the filing deadlines; however it should be noted that the PAC has been a dormant PAC with no activity having transpired up through June 30<sup>th</sup>, 2010; and further that when all quarterly reports were filed they accurately reported that there was no activity for the PAC in those quarters. As such, there has been no intent to hide or withhold information from the FEC or from any other individual or organization.

**Note:** Activity for the PAC did begin for the first time in September, 2010, and will be accurately reported in the 3<sup>rd</sup> quarter report which is due by October 15<sup>th</sup>, 2010. The 3<sup>rd</sup> quarter report and will be filed on time; and all subsequent filings will be made in a timely manner.

**Allegation #2, (page 2 of 5, MUR 6375, see attached Appendix A for reference):**

**Response:** In all instances, the described activities were undertaken and performed by the non-profit Independence Caucus corporation, not by the Independence Caucus PAC;

In all instances, the described activities undertaken by the non-profit corporation were in compliance with the Act.

In all instances, these activities were either performed by individuals who were volunteering their uncompensated personal services (100.74.) and/or or they were individuals engaging in uncompensated internet activities in compliance with the act (100.94).

In all instances, no purchases or payments for public communications were made, and no purchases or rental payments for e-mail address lists were made, and no email lists were ever given or transferred to a political committee (100.94(e)).

In all cases, all activities undertaken were in complete accordance with the guidelines expressed in the "FEC Citizens Guide Brochure: Published in February 2004, Updated January 2009" which states: "Personal Services: An individual may help candidates and committees by volunteering personal services. For example, you may want to take part in a voter drive or offer your skills to a political committee. Your services are not considered contributions as long as you are not paid by anyone."

In all cases, no volunteers have ever been compensated for their activities on behalf of any candidates by the Independence Caucus or by any other entity or political committee.

**Allegation #3, (page 2 of 5, MUR 6375, see attached Appendix A for reference):**

Response: Categorically denied. The FEC report(s) cited do not contain false information.

**Allegation #4a, 4b, 4c, 4d, 4e, 4f, 4g, 4h, 4i, 4j, 4k, 4L, 4m, and 4n (beginning on page 2 of 5 and continuing through page 3 of 5. MUR 6375, see attached Appendix A for reference):**

Response: In all instances, all of the statements and allegations contained in these 13 paragraphs are activities that were undertaken and performed by the non-profit Independence Caucus corporation, not by the Independence Caucus PAC;

In all instances, these activities undertaken by the non-profit corporation were in compliance with the Act.

In all instances, these activities were either performed by individuals who were volunteering his or her uncompensated personal services (100.74.) and/or they were individuals engaging in uncompensated internet activities in compliance with the act (100.94).

In all instances, no purchases or payments for public communications were made, and no purchases or rental payments for e-mail address lists were made, and no email listed were ever given or transferred to a political committee (100.94(e)).

In all cases, all activities undertaken were in complete accordance with the guidelines expressed in the "FEC Citizens Guide Brochure: Published in February 2004, Updated January 2009" which states: "Personal Services: An individual may help candidates and committees by volunteering personal services. For example, you may want to take part in a voter drive or offer your skills to a political committee. Your services are not considered contributions as long as you are not paid by anyone."

In all cases, no volunteers have ever been compensated for their activities on behalf of any candidates by the Independence Caucus or by any other entity or political committee.

In all instances, any reference to fundraising is in relation to fundraising for the Independence Caucus non-profit corporation; no fundraising was solicited or received for the Independence Caucus PAC, and no fundraising was solicited or received for any other political committees or candidate committees.

In all instances, if any donations have ever been solicited for or made to any federal candidate at any event hosted by the Independence Caucus non-profit corporation, those donations were solicited by the candidates themselves and made by individual attendees who donated directly to the Candidate.

**Allegation #5. (page 3 of 5, MUR 6375, see attached Appendix A for reference):**

Response: This paragraph contains allegations about several different events, and one in particular has to be addressed separately from the others.

In regards specifically to any references to the "Meet and Greet" event held in Washington DC from September 9<sup>th</sup> through September 12<sup>th</sup>, 2010; our response is that all of the Federal candidates who participated in that event were charged and paid a fee to the Independence Caucus non-profit corporation to pay for all services and expenses of that event. Accordingly, any and all expenditures for that event were paid for by the candidates, and thus were not contributions in any way.

In regards to all other events referenced in this paragraph, our response is exactly the same as the response to allegations 4a through 4n that were cited above.

**Allegation #6. (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: This is not correct. The "Big Stick Tea party" was organized by the non-profit Independence Caucus corporation, not by the Independence Caucus PAC; and this activity undertaken by the non-profit corporation was in compliance with the Act.

In its entirety, the "Big Stick Tea party" was and is a legitimate exercise of free speech and protest to our elected officials. Accordingly, the activity was not connected to election activity.

**Allegation #7. (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: This allegation is partly a statement of true fact that is not in violation of FEC rules; and the balance of the allegation is not correct, i.e:

The complainant states that "Independence Caucus volunteers are spending their own money to promote the organization" which is a factual statement that is not in violation of FEC rules. As unpaid volunteers, some of our members have indeed expended their own money to promote our non-profit organization; because they believe in the mission of the Independence Caucus non-profit corporation, and are willing to support that mission financially; which is not a violation of any laws or FEC rules.

However, the complainant further states in the same sentence that "Independence Caucus volunteers are spending their own money to...help candidates" which is false. We are not aware of any Independence Caucus member or volunteer who is spending money or has spent money to help candidates in connection with any non-profit Independence Caucus activities, nor has any Independence Caucus member or volunteer been asked to do so, or directed to do, or encouraged to do so on behalf of any candidates, PAC, or campaign committee.

In addition, in all instances where an Independence Caucus member or volunteer has spent "their own money to promote the organization", the expenditure was initiated and performed by individual volunteers on behalf of the non-profit Independence Caucus corporation, and not on behalf of the Independence Caucus PAC;

**Allegation #8, (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: This is not correct. The production and sale of yard signs was conducted by the Independence Caucus non-profit corporation as a vendor, selling individually printed signs for \$8 each to individual buyers.

Unlike normal sign print runs, the printing was done with a digital printer which allowed individuals to purchase and print 1 single sign at a time, and this technology allowed each sign to be individually personalized at the time of printing with the specific name of a candidate chosen by the individual purchaser, and with an individual personalized disclaimer notice stating "Paid for by (the name of the individual)"

The intent of this venture was to make the sale of individual personalized signs into a profit center for the Independence Caucus non-profit corporation, but the venture failed to catch on with the public and failed to be profitable and was abandoned after only 55 signs were sold.

In addition, the sale of the signs did not require reporting for the following reasons:

- 1 – No sale of signs for any single candidate reached or exceeded the \$200 reporting limit.
- 2 – The most signs that were sold for any one candidate was 20 signs, for a total sale price of \$160.00 and those 20 signs were bought and paid for by the candidate's campaign, so that sale was a purchased expense paid for by the candidate and not a donation from any individuals.
- 3 – Other than the \$160.00 purchase by the candidate referenced above, no other individual(s) spent more than \$80 on any sign purchase for a candidate.

**Allegation #9, (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: This is not correct. The Independence Caucus PAC does not have a website and does not send mass emails.

All websites and mass emails described in this paragraph are operated and utilized by the non-profit Independence Caucus corporation.

In all instances, these websites operated by the non-profit corporation are in compliance with the Act, which excludes communications over the Internet, except for advertisements placed on another person's website. (100.26)

No internet advertising has ever been purchased by the Independence Caucus non-profit corporation, and no paid internet advertisements have ever been placed (100.26)

**Allegation #10, (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: In all instances, the activities referenced were undertaken and performed by the non-profit Independence Caucus corporation, not by the Independence Caucus PAC;

In all instances, these activities undertaken by the non-profit corporation were in compliance with the Act.

In all instances, any reference to fundraising is in relation to fundraising for the Independence Caucus non-profit corporation. No fundraising was solicited or received for the Independence Caucus PAC, and no fundraising was solicited or received by the Independence Caucus for any other political committees or candidate committees.

In all instances, if any donations have ever been solicited for or made to any federal candidate at any event hosted by the Independence Caucus non-profit corporation, those donations were solicited by the candidates themselves and made by individual attendees who donated directly to the Candidate.

In all instances, these activities were either performed by individuals who were volunteering his or her uncompensated personal services (100.74.) and/or they were individuals engaging in uncompensated internet activities in compliance with the act (100.94).

In all instances, no purchases or payments for public communications were made, and no purchases or rental payments for e-mail address lists were made, and no email listed were ever given or transferred to a political committee (100.94(e)).

In all cases, all activities undertaken were in complete accordance with the guidelines expressed in the "FEC Citizens Guide Brochure: Published in February 2004, Updated January 2009" which states: "Personal Services: An individual may help candidates and committees by volunteering personal services. For example, you may want to take part in a voter drive or offer your skills to a political committee. Your services are not considered contributions as long as you are not paid by anyone."

In all cases, no volunteers have ever been compensated for their activities on behalf of any candidates by the Independence Caucus or any other entity or political committee.

**Statement #12, (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: This is a factual statement, with no allegation made and no response is needed.

**Allegation #11, (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: Categorically denied. The news article that is cited by the complainant as the basis for this allegation is incorrect on several counts, and either the author or the author's sources for this story have made their own incorrect conclusions.

The author of this story states incorrectly that "...the tea party coalitions in several states (including in Michigan) operate in strategic partnership with an organization set up specifically as a Political Action Committee."

In fact, the Independence Caucus was set up specifically as a non-profit corporation to conduct research, education, and citizen activist training activities which include vetting and endorsing candidates for public office. The reason other organizations that approve of our candidate vetting and endorsement process encourage their members to participate in our process, is because we have not applied for 501c tax exempt status from the IRS, which allows our organization to exercise our free speech right to endorse candidates.

**Allegation #13, (page 4 of 5, MUR 6375, see attached Appendix A for reference):**

Response: It is factual that Ken Ivory is now one of the state endorsed candidates from Utah. We do not understand what the nature of this allegation is. Ken Ivory's choice to leave the Independence Caucus non-profit corporation in order to devote time to running for office has no connection with FEC regulations that we can conceive of.

It is also factual that Monte Bateman chose to leave the Independence Caucus non-profit corporation in order to create and run a for-profit organization called iPoliticom.

However, the allegation that his doing so "allows iPoliticom to act as a direct support system for the Independence Caucus" is categorically denied and we believe it to be nonsensical for the following reasons:

1 - iPoliticom, if viable and functioning, sells their consulting services to candidates, and neither the Independence Caucus non-profit corporation or the Independence Caucus PAC are candidates, therefore it does not make sense that iPoliticom's activities would provide any systemic support to our organization.

2 - iPoliticom's services are an expense to candidates, and the Independence Caucus doesn't benefit in any way or receive any system support when and if a candidate expends money on political consulting services.

In addition to the nonsensical nature of the allegation, iPoliticom as an entity appears to be defunct or dormant, and no director or treasurer of the Independence Caucus has had any contact with Monte Bateman since April of 2010.

**Allegation #15, (page 5 of 5, MUR 6375, see attached Appendix A for reference):**

Response: The allegations contained in the complainants section titled "Conclusion" are categorically denied.

**Additional Relevant Information:**

All of the complainants appendix attachments are factual, and actually do not support the complainants allegations, as it appears that the complainant is either unaware that we are a non-profit organization; and/or was misled by the inaccurate news reporting as explained above in our response to allegation #11 and has added those appendix attachments in the mistaken belief that they represent activity of a PAC, when in reality they represent the activities of our non-profit corporation.

However, one set of the complainant's attachments does apply to actual PAC activity, and we have attached copies of those relevant attachments as our Appendix B

That set of attachments refers to the first ever activity for the PAC that we have engaged in, and that activity began in September, 2010, and will be accurately reported in compliance with FEC rules within the 3<sup>rd</sup> quarter report filing which is due by October 15<sup>th</sup>, 2010.

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**Conclusion of response:**

The complainants conclusions are based on the incorrect allegations that were made throughout the complaint, and it is our conclusion that the complainant must be either unaware that we are a non-profit organization; and/or was misled by the inaccurate news reporting as explained above in our response to allegation #11.

In addition, there are numerous references throughout the complainant's allegations to "seed money" and negative inferences such as "tip of the iceberg", "coordination", "irresponsible", and "boasting" with the overall intent to convince the FEC that our organization's activities appear to be a giant money laundering scheme for candidates. We categorically deny and reject those inferences and characterizations.

Our non-profit organization is a 100% volunteer organization, with no salaried staff and no salaried leadership, and no money was ever solicited, received, or expended for the Independence Caucus PAC up through the end of the last filing period, and our filings with the FEC are accurate and true.

Respectfully submitted,



Frank Anderson  
Co-founder, The Independence Caucus  
Treasurer, The Independence Caucus PAC  
793 Orchard Drive  
Pleasant Grove, UT 84062

Signed and sworn to before me this 7<sup>th</sup> day    of October, 2010



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# APPENDIX A

Hard Copy of MUR #6375 Complaint; Beginning on Page 2 of 5  
Allegations numbered sequentially for reference purposes.

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In addition, although the Independence Caucus website indicates that they do not give money directly to candidates, they have announced fundraisers wherein the money will be given directly to candidates. See, i.e., Independence Caucus Candidate Guide, pg. 2, at <http://www.icaucus.org/media/2010Catalog/>.

### FEC VIOLATIONS BY THE INDEPENDENCE CAUCUS

#### Allegation #1A

Upon information and belief, nearly two months after the filing deadline for the FEC July 15<sup>th</sup> 2010 2<sup>nd</sup> quarter report, the Independence Caucus has failed to file its 2<sup>nd</sup> quarter report. See <http://query.nictusa.com/cgi-bin/fecimg/?C00461764>.

#2

Upon information and belief, the Independence Caucus was involved in helping candidates who were in contested primary races, but failed to file any pre-primary FEC reports.

#1B

Upon information and belief, The Independence Caucus has a history of filing very late FEC reports. See <http://query.nictusa.com/cgi-bin/fecimg/?C00461764>.

#3

Upon information and belief, The Independence Caucus FEC reports, both the April 15<sup>th</sup> 2010 1<sup>st</sup> quarter report, as well as the 2009 End of Year Report, contain false information (see below).

#4

Upon information and belief, both the April 15<sup>th</sup>, 2010 report and the 2009 End of Year Report list all of their contributions and expenditures as \$0.00. See <http://query.nictusa.com/pdf/195/10030284195/10030284195.pdf#navpanes=0> and <http://query.nictusa.com/pdf/188/10030284188/10030284188.pdf#navpanes=0>.

(4b)

Upon information and belief, the Independence Caucus has brought in donations (see below).

(4c)

Upon information and belief, in early 2010, Frank Anderson of the Independence Caucus boasted at least 12,000 Independence Caucus voting members nationwide. See <http://www.wsradio.com/wsradio-player.cfm?wme/News/show/WashingtonTimes-Inside-the-Story-Radio/segment/29863.html>.

(4d)

Upon information and belief, Independence caucus *members* participate in endorsement votes, but need not necessarily contribute financially, though they are encouraged to do so. See [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=92&Itemid=159](http://www.icaucus.org/index.php?option=com_content&view=article&id=92&Itemid=159).

(4e)

Upon information and belief, to be an Independence Caucus delegate, one must contribute financially, a minimum contribution of \$40.00. Upon information and belief, only DELEGATES may hold campaign leadership positions, act as Representatives of iCaucus, and participate in interview panels and the annual policy review. See [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=93&Itemid=56](http://www.icaucus.org/index.php?option=com_content&view=article&id=93&Itemid=56).

(4f)

Upon information and belief, the Independence Caucus currently boasts 46 endorsed FEDERAL candidates (more before the primaries), from 16 states (more before the primaries), each of whom, in

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addition to the endorsed state candidates, has an Independence Caucus campaign team assigned to him or her. See [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=89&Itemid=104](http://www.icaucus.org/index.php?option=com_content&view=article&id=89&Itemid=104).

(4g) → Upon information and belief, the Independence Caucus currently has 11 or more national directors. See [http://www.icaucus.org/index.php?option=com\\_contact&view=category&catid=94&Itemid=55](http://www.icaucus.org/index.php?option=com_contact&view=category&catid=94&Itemid=55).

(4h) → Upon information and belief, the Independence Caucus currently has 38 or more Regional Directors. See [http://www.icaucus.org/index.php?option=com\\_contact&view=category&catid=95&Itemid=154](http://www.icaucus.org/index.php?option=com_contact&view=category&catid=95&Itemid=154).

(4i) → Upon information and belief, the Independence Caucus also has state and district managers, in addition to numerous campaign liaisons. See [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=89&Itemid=104](http://www.icaucus.org/index.php?option=com_content&view=article&id=89&Itemid=104).

(4j) → Upon information and belief, the Independence Caucus solicits donations from the general public as well. See <http://www.icaucus.org/>; [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=216](http://www.icaucus.org/index.php?option=com_content&view=article&id=216).

(4k) → Upon information and belief, the Independence Caucus has held fundraising events, where they have had a respectable turnout. See, i.e., <http://www.ourcaucus.com/fundraiser.html>.

(4l) → Upon information and belief, ~~the Independence Caucus has had expenditures~~ (see below).

(4m) → Upon information and belief, Independence Caucus directors in their capacity with the Independence Caucus, have travelled nationwide for organizational trainings, fundraisers, and other events. See, i.e., <http://www.redstate.com/ncindependence/2010/07/03/independence-caucus-founder-frank-anderson-in-sc-nc-and-va/>; <http://triangle.ncfreedom.us/2010/07/09/independence-caucus-founder-frank-anderson-to-visit-raleigh-area/>; <http://www.resistnet.com/events/independence-caucus-rally-and-1>; <http://www.facebook.com/group.php?gid=50513176160>.

~~(4n)~~ → Upon information and belief, Independence Caucus has had expenditures for conventions, booths, signage, debates, fundraisers, etc. See [http://www.resistnet.com/group/mariandresistance/forum/topics/icaucus-candidate-meet-and-5?xg\\_source=activity](http://www.resistnet.com/group/mariandresistance/forum/topics/icaucus-candidate-meet-and-5?xg_source=activity); <http://www.ourcaucus.com/fundraiser.html>; <http://www.eventhrite.com/event/460332868>; [http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481#/photo.php?pid=5767158&id=267632555481&ref=fbx\\_album](http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481#/photo.php?pid=5767158&id=267632555481&ref=fbx_album); [http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481#/photo.php?pid=6904307&id=267632555481&ref=fbx\\_album](http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481#/photo.php?pid=6904307&id=267632555481&ref=fbx_album); [http://www.youtube.com/watch?v=ODEmNlQOp8&feature=player\\_embedded](http://www.youtube.com/watch?v=ODEmNlQOp8&feature=player_embedded); [http://tellyourneighbor.com/icaucus/ic\\_activist-volunteer.html](http://tellyourneighbor.com/icaucus/ic_activist-volunteer.html);

(4n) → Upon information and belief, the Independence Caucus has an online store where they sell icaucus gear, which requires seed money. See <http://www.cafepress.com/icaucus>.

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#6

Upon information and belief, the Independence Caucus has engaged in an endeavor that they call a "big stick tea party," wherein they sponsor an individually personalized Tazbag and letter to send to Senator Barbara Boxer (D-CA), or any other incumbent (who is not endorsed by them) throughout the country, for \$5 or \$15, an endeavor that also requires seed money. See <http://www.ourcaucus.com/BigStick.html>.

#7

Upon information and belief, Independence Caucus volunteers are spending their own money to promote the organization and help candidates, without reporting anything, see, i.e., <http://www.resistnet.com/group/newyorkpatriots/forum/topics/independence-caucus-1?commentId=2800775%3AComment%3A2152636&groupId=2600775%3AGroup%3A40761>.

#8

Upon information and belief, the Independence Caucus has distributed and used candidate yard signs, even sold them on their website, wherein they promote a federal or state candidate, but do not have any disclaimers, and do not report them as license, expenditure, or in-kind contributions. See i.e., <http://mainfables.blogspot.com/2010/04/in-test-yard-signs-i-caucus.html>; [http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481?v=wall#/photo.php?pid=5767158&id=267632555481&ref=fbx\\_album](http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481?v=wall#/photo.php?pid=5767158&id=267632555481&ref=fbx_album).

#9

Upon information and belief, the Independence Caucus has multiple state-of-the-art websites, and a large e-mail list, wherein they support specific federal candidates, but they do not use proper disclaimers on their websites or mass e-mails. See <http://www.icaucus.org>; <http://www.ourcaucus.com>; <http://www.icaucus.us>; <http://www.ourcaucus.net>.

#10

Upon information and belief, the Independence Caucus has helped numerous federal candidates with their fundraising efforts. See, i.e., [http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481?v=app\\_2309869772](http://www.facebook.com/pages/Independence-Caucus-Southern-California/267632555481?v=app_2309869772).

#11

Upon information and belief, other tea party groups are working in tandem with and directing people to the Independence Caucus if they want to help candidates directly, because unlike them, the Independence Caucus is a PAC. See, i.e., <http://www.rightmichigan.com/story/2010/8/25/18586/3793>.

#12

Upon information and belief, the Independence Caucus was founded by Frank Anderson, Monte Bateman, and Ken Ivory. See [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=92&Itemid=159](http://www.icaucus.org/index.php?option=com_content&view=article&id=92&Itemid=159).

#13

Upon information and belief, Ken Ivory is now one of the state endorsed candidates from Utah, and Monte Bateman is running a for-profit organization called iPoliticom, wherein he gets paid to consult candidates, such as those endorsed by the Independence Caucus, and allows iPoliticom to act as a direct support system for the Independence Caucus, once again without any disclosure or reporting. (Note that the Independence Caucus is not filed as a connected PAC). See <http://ipoliticom.com>; [http://ipoliticom.com/?page\\_id=24](http://ipoliticom.com/?page_id=24); [http://ipoliticom.com/?page\\_id=102](http://ipoliticom.com/?page_id=102).

Upon information and belief, the above allegations are just the tip of the iceberg with respect to the Independence Caucus, as the documentation submitted in the appendix contains just a few examples of publicly available information. With such a widespread organization, in so many states, and with so much activity, there are likely many other examples of violations.

Appendix A

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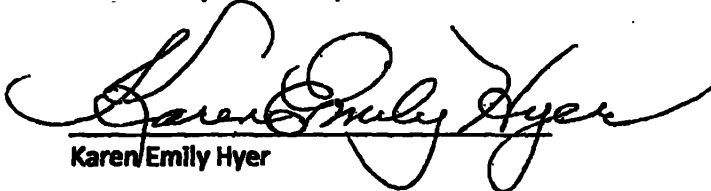
### CONCLUSION

Upon information and belief, violations are likely not just limited to the Independence Caucus, but include many of the committees of candidates who have been endorsed by and helped by the Independence Caucus, as likely, there has been a great deal of coordination.


#15  
If the Independence Caucus has been so irresponsible in following the law now, what is to say that they were abiding by the law in 2008, as the group of key campaign volunteers with leadership roles in the Chaffetz campaign, who claim responsibility for Congressman Jason Chaffetz's 2008 election? The Independence Caucus asserts that Congressman Jason Chaffetz (R-UT-3) is their mentor, saying that everything they know they learned from him. See [http://www.icaucus.org/index.php?option=com\\_content&view=article&id=46&Itemid=71](http://www.icaucus.org/index.php?option=com_content&view=article&id=46&Itemid=71). In 2009-2010, the same people behind the Chaffetz campaign got heavily involved in working for the defeat of Senator Bob Bennett (R-UT). See <http://www.meetup.com/NOVA-912-Group/calendar/14151618/>.

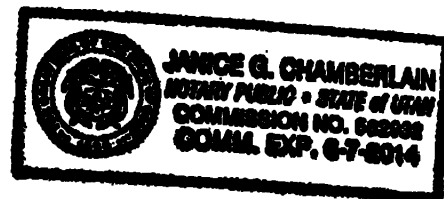
It is imperative that the Federal Election Commission seriously and immediately review all of the enclosed allegations of FEC violations against The Independence Caucus, along with the supporting documentation. The actions of the Independence Caucus have a direct impact on many races throughout the nation.

Respectfully submitted,

  
Karen Emily Hyer

Signed and sworn to before me this 13<sup>th</sup> day of September, 2010.





# APPENDIX B

**Hard Copy of the only MUR #6375 complainant's Appendix attachments that do apply to actual PAC activity.**

**This set of attachments refers to the first ever activity for the Independence Caucus PAC engaged in, which activity began in September, 2010, and which will be accurately reported in compliance with FEC rules within the 3<sup>rd</sup> quarter report filing which is due by October 15<sup>th</sup>, 2010.**

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13044342824

The Independence Council is proud to announce our involvement with the **UNITED BY ACTION MARCH ON DC**, September 24th - 25th, 2008.

**PLANS**

March on Action presents the March on DC Library Exhibit of American Independence 1776-2008.

Independent Leaders Run March will be featured throughout the event.

Thursday, September 24th - Educational/Training Session  
Ford Auditorium, Strategic Co-ordinator to be held.

Saturday, September 26th - March on DC Library Exhibit  
Exhibition of The Great American Seal and Constitution History  
Government will coordinate and march down the street starting at the National Mall and ending at the Lincoln Memorial, with a lot of activities at the Convention and through the National Mall.

Sunday, September 27th - 19th National Service  
Staple John, National Director of Operations & Executive  
March on Action

College Group, National Student Conference/Forum held  
to perform for school song, "The Star-Spangled Banner"

Last year's March on DC brought together close to 1 million people. America, yet most people  
couldn't attend due to bad weather and lack of transportation. One of the biggest  
problems in the march is money, and we need more people to help. We need  
"The Star-Spangled Banner", Washington and the March on DC to be the most  
successful. Let us, once again, make the march and gather in  
Washington DC for the Convention here that we have not enough.

For detailed information regarding all March on DC events, please click here.

Click here for more information about the March on DC, and for more information about the march.

**GROUPS**

**MISSION**

**THE MARCH**

**CANDIDATES**

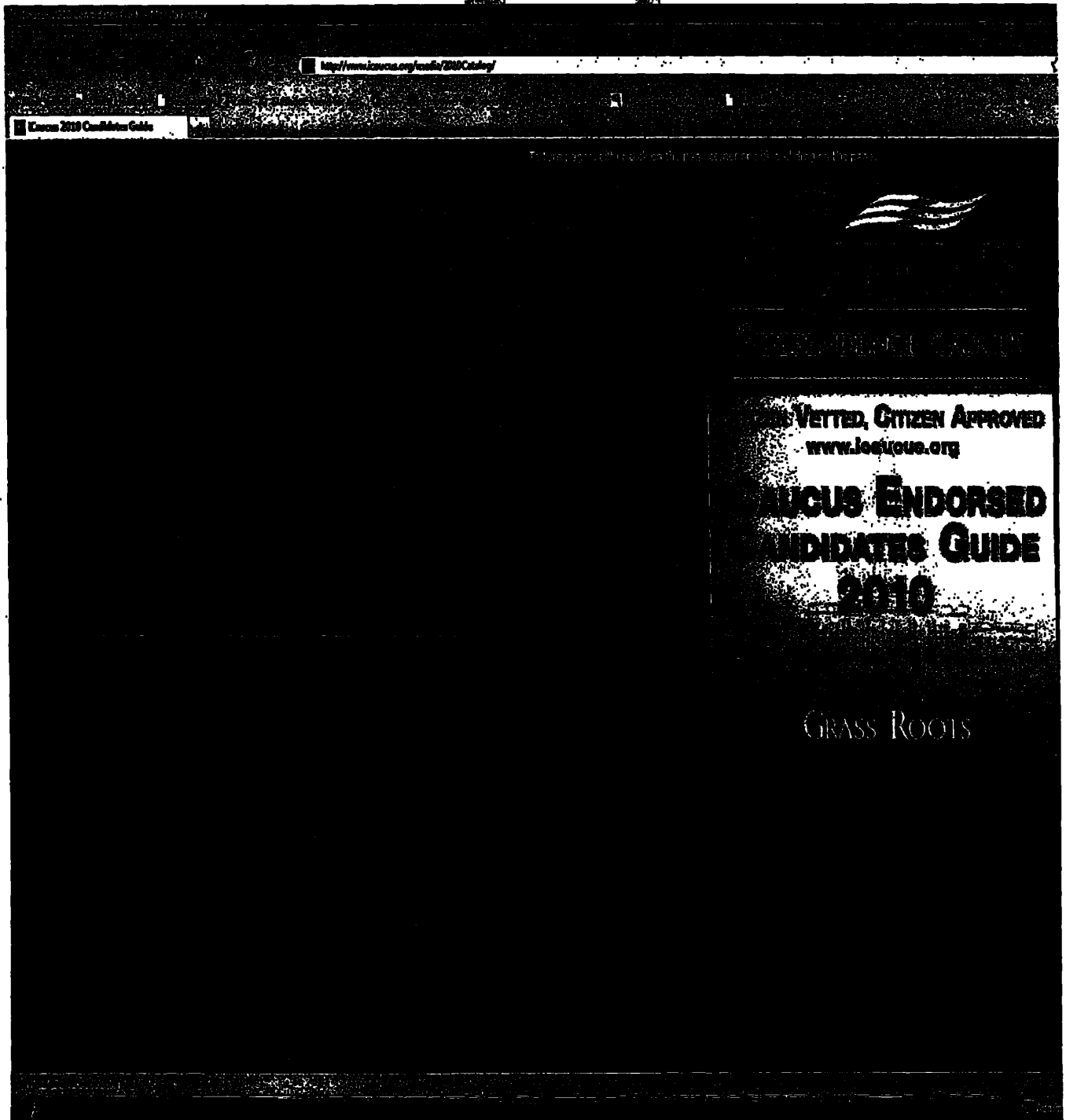
**NO SUPPORT**

The March on Action is a  
march on the National Mall  
in Washington, D.C. on  
September 24th and 25th, 2008.  
The march is a part of the  
National Service, and is a  
part of the National Service.  
The march is a part of the  
National Service, and is a  
part of the National Service.  
The march is a part of the  
National Service, and is a  
part of the National Service.

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The image shows a scan of a newspaper page with two prominent political advertisements. The left advertisement is titled "ABOUT ICAUCUS CANDIDATE" and discusses the importance of the upcoming election, the role of the Icaucus candidate, and the need for voter participation. It includes a small graphic of a person holding a sign. The right advertisement is titled "WE'RE HERE TO TAKE YOUR COUNTRY BACK" and focuses on the need for a strong leader to protect the country. It features a graphic of a person holding a sign and a "DONATE NOW" button. Both advertisements use bold text and clear graphics to convey their messages.

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[illegible]

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**Robert Hammond, 69, Assembly District - CA**  
 Candidate, seeking to succeed John Leland in  
 Assembly District 10, representing the City of San Francisco.  
 Email: [robert.hammond@sanfordandhammond.com](mailto:robert.hammond@sanfordandhammond.com)

**THE FUTURE IS ACHIEVING SUCCESS - NOW!**  
 A Great Tomorrow Is Not The Day, Tomorrow - It's Today!  
 (Transformational Transformational World Series)  
 Challenge, making it work! (Even Independent Study Work!)  
 It's time to do it now!

**Don't Miss: Subversive! Candidate - GO**  
 From west, looking to replace existing trademark (B) with (B)  
<http://www.donnam.com>

200th Street 5<sup>th</sup> Congressional District - CO  
 Challenges, seeking to amend 2 hour threshold John Oliver 20  
 joliver@coloradobliss.com

**John Hironaka: 1<sup>st</sup> Congressional District R,**  
 Co-Chair, working to protect & improve Washington State water for  
[johnhironaka@congress.com](mailto:johnhironaka@congress.com)

Mike West: 5<sup>th</sup> Congressional District - FL  
 Challenge: reality is what it is but benefit of freedom from  
[mikewestfl.com](http://mikewestfl.com)

**My Name: 4 Congressional District -FL**  
**Address: 10000 1st Street, Suite 100, Orlando, FL 32817**  
**Phone: 407.255.1111**

Charles Rouse II<sup>2</sup> Congressional District -FL  
 1991-1992, working to replace bankrupt Adam Pataki (R)  
 and get the district across

Where Received: 09/24/2010 House District - 51  
 Can not verify or confirm that the actual City Clerk  
 signed or made the return.

**Robert Hammond, 69, Assembly District - CA**  
 Candidate, seeking to succeed John Leland in  
 Assembly District 10, representing the City of San Francisco.  
 Email: [robert.hammond@sanfordandhammond.com](mailto:robert.hammond@sanfordandhammond.com)

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Mike West: 5<sup>th</sup> Congressional District - FL  
 Challenge: reality is what it is but benefit of freedom from  
[mikewestfl.com](http://mikewestfl.com)

**My Name: 4 Congressional District -FL**  
**Address, adding to street if you include Apt/Condo**  
**City/State/Zip**

Charles Rouse II<sup>2</sup> Congressional District -FL  
 1991-1992, working to replace bankrupt Adam Pataki (R)  
 and get the district across

Where Received: 09/24/2010 House District - 51  
 Can not verify or confirm that the actual City Clerk  
 signed or made the return.

## Appendix B

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Internet Explorer 8.0.6002.1500  
http://www.cnet.com/.../2010/Candidate/...  
Forward Back Stop Home Starting Collect  
Most Visited | Latest Headlines | Availability | Zoho | Start Date: News for me... | Copy | Export | Share  
Current 2010 Candidates Guide +

Table with 2 columns: Endorsed Candidates - Florida - US House, Endorsed Candidates - Indiana - US House

Endorsed Candidates - Florida - US House	Endorsed Candidates - Indiana - US House
<b>Sean Patrick Lee: 1st Congressional District - FL</b> Challenges, seeking to succeed 1 term incumbent Mike Ross (R) http://www.seanlee.com	<b>Tim McIntyre: State 47th Senate District - IN</b> Challenges, seeking to succeed 6 term incumbent Richard Young (R) http://www.timmcintyre.com
<b>Leah Campbell: 1st Congressional District - FL</b> Challenges, seeking to succeed 1 term incumbent Linda Starnett (R) http://www.leahcampbell.com	<b>Mark Mancoske: State 63rd Assembly District - IN</b> 1 term incumbent seeking re-election (R) http://www.mancoske.com
<b>Jason Hayes: 2nd Congressional District - FL</b> Challenges, seeking to succeed 1 term incumbent Jason Hayes (R) http://www.jasonhayes.com	<b>David Decker: State 69th Assembly District - IN</b> Challenges, seeking to succeed 1 term incumbent George W. Foster (R) http://www.daviddecker.com
<b>Joe Webb: 3rd Congressional District - FL</b> Challenges, seeking to succeed 2 term incumbent Melissa Sims (R) http://www.joe webb.com	<b>Wes Robinson: State 69th Assembly District - IN</b> Challenges, seeking to succeed incumbent Wes Robinson (R) http://www.wesrobinson.com
<b>Just Polite: 4th Congressional District - FL</b> Challenges, seeking to succeed 1 term incumbent Just Polite (R) http://www.justpolite.com	<b>Dr. David Mark: State 69th Assembly District - IN</b> Challenges, seeking to succeed incumbent Thomas H. Mark (R) http://www.drmark.com
<b>Paul Newman: 5th Congressional District - FL</b> Challenges, seeking to succeed 1 term incumbent Paul Newman (R) http://www.paulnewman.com	<b>Mike Roberts: Secretary of State - IN</b> Open seat, seeking to replace term-limited outgoing Ted Strickland (R) http://www.mikeroberts.org
<b>Shelly Bellamy: 10th Congressional District - FL</b> Challenges, seeking to succeed 1 term incumbent Shelly Bellamy (R) http://www.shellybellamy.com	<b>Jim Redinger: U.S. Senate - IN</b> Challenges, seeking to succeed 4 term incumbent George Voinovich (R) http://www.jimredinger.com
<b>Justin Whitworth: 2nd Congressional District - IN</b> Challenges, seeking to succeed 2 term incumbent Justin Whitworth (R) http://www.justinwhitworth.com	<b>Ray Shaffer: 3rd Congressional District - IN</b> Challenges, seeking to succeed 1 term incumbent Ray Shaffer (R) http://www.rayshaffer.com
<b>Todd Young: 9th Congressional District - IN</b> Challenges, seeking to succeed 1 term incumbent Todd Young (R) http://www.toddyoung.com	<b>Colleen Bailey: 9th Congressional District - IN</b> Challenges, seeking to succeed 1 term incumbent Colleen Bailey (R) http://www.colleenbailey.com

www.cnet.com

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[illegible]

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**Senat: Mike 5<sup>th</sup> Congressional District - RI**  
 1000 Washington Street  
 02860 Providence, RI 02860  
 401-863-8800  
 401-863-8800  
 401-863-8800

**Senat: Mike 7<sup>th</sup> Congressional District - RI**  
 1000 Washington Street  
 02860 Providence, RI 02860  
 401-863-8800  
 401-863-8800  
 401-863-8800

# NOTHING BUT THE CAUCUS

6th District Constitutional Union	Concordia Village Brooks Farm	Kettles Cove Co.
Elginham	Wilmington Beach Pavilion	Excluded RE
Arkansas Campaign in Library	House of Deafest 682 Pages	San Diego Campaign Republican Party
ArkRight Magazine	In District No Party	San Francisco Campaign Republican Party
As A Man Abstract of History Notes	Leahville Library	San Francisco Valley
Atlanta the WC	Lester County The New Nation	St. Charles RE the House
Bel Air The Party Pavilion	Library - Winston	Sanctuary Limited
Bonnet RE	Monroe County The Party	THE DANCE THE
Central Monthly	Midland The Party African	The Oldham Nationalist Party
Cherokee County S.D. Pages	Opportunity	The White Mountain Cooperation
Citizen Publishing	Pine Institute	United States Marine Corps
Constitutional Library	Rockledge Covey The Party	Valley County The
Excess Charges Notice	Reflected Entry	Washburn 682 Pages
Our Justice	Republican Party Control of Party Control	Wilmington Constitutional Union
Grand National Temperance Society Papers	Republican Party Control of S.D.	
Grassroots News	Re: S.D.	

[illegible]



**SO YOU THINK IT CAN'T BE DONE?  
WE'VE ALREADY PROVEN THAT IT CAN!**

## THE JASON CHABETZ ELECTION MIRACLE

In 1992, the most conservative district of the country spent less. Offit had never before run for political office when he decided to sidestep the party establishment and lines of opinion between US Congress and US state legislatures. District 10. With very little money he led by a factor of 1000 volunteers, Jones and a locally organized campaign centered on his promise to uphold the US Constitution against government spending and represent Utah to Washington, not Washington to Utah.

During the campaign, Congressmen and senators taking a direct but less visible part in public opinion and the big money spent on the people who were heavily beating Clinton's campaign with one of our allies. Congressmen: Clinton's loss and control of the Senate from the state of Florida. But Clinton's loss in the state and the state's major newspapers in the Senate. Against overwhelming odds, Clinton and his allies in the Senate, but Clinton's loss in the state and the state's major newspapers in the Senate. Against overwhelming odds, Clinton and his allies in the Senate, but Clinton's loss in the state and the state's major newspapers in the Senate.

**Jack's story is being lived all. Using the know-how from his campaign, Connor is showing America how to effectively challenge congressional incumbents who run up for re-election in 2006 and beyond. With us, TDFP is taking the country back from the big money special interests and back to the people's common sense.**



**Thames Police investigate our voting process. Why? Because citizens should be informed and involved in the voting and electing of their representatives. It is not just our right. It is our responsibility.**

### Jan. 15th Census today to show how many unemployed

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